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*Attorneys for Defendants  
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Leilani Flores, Jo Gentry and Dwight Neven*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

ELIZABETH CARLEY,

Plaintiff,

v.

WARDEN NEVEN, et al.,

Defendants.

Case No. 2:17-cv-02346-MMD-CLB

**STIPULATION FOR EXTENSION OF TIME  
TO FILE DISPOSITIVE MOTIONS  
(Second Request)**

Plaintiff, Elizabeth Carley, by and through counsel, Lisa A. Rasmussen, and Defendants, Romeo Aranas, Beebe Clark, James Cox, James Dzurenda, Leilani Flores, Jo Gentry and Dwight Neven, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, and Douglas R. Rands, Senior Deputy Attorney General, hereby stipulate to extend the deadline to file dispositive motions to January 18, 2022. The Court, in ECF 45, established that dispositive motions were to be filed by October 31, 2021. October 31, 2021 was a Sunday. A previous extension was granted by this Court. ECF No.75.

Counsel for the Defendants has had an extremely busy November. Counsel was involved, in addition to his usual practice, with an evidentiary hearing in Las Vegas in the death penalty case of Zane Floyd v NDOC. Counsel has also completed dispositive motions in 3 other cases and is preparing for a jury trial in December. Therefore, the dispositive motion, in this matter, has not been completed. With the holidays approaching, Counsel for the Defendants requests additional time to complete the motion.

On November 30, 2021, Counsel for Plaintiff and Counsel for the Defendants had an email exchange in which the extension was agreed upon. Accordingly, the parties hereby stipulate to extend

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the deadline to file dispositive motions from November 30, 2021 to **January 18, 2022**. The parties respectfully request the Court grant the request, and extend the deadline.

DATED this 30<sup>th</sup> day of November, 2021  
LISA A. RASMUSSEN, ESQ.  
Law Offices of Kristina Wildeveld & Assoc.

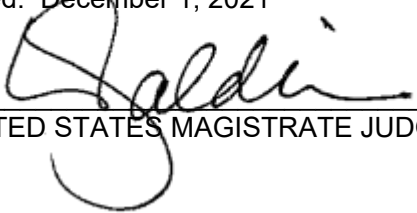
DATED this 30th day of November, 2021  
AARON D. FORD  
Attorney General

By: /s/ Lisa A. Rasmussen  
LISA A. RASMUSSEN, Bar No. 7491  
*Attorney for Plaintiff*

By: /s/ Douglas R. Rands  
DOUGLAS R. RANDS, Bar No. 3572  
Senior Deputy Attorney General  
*Attorneys for Defendants*

IT IS SO ORDERED.

Dated: December 1, 2021

  
UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE**

I certify that I am an employee of the Office of the Attorney General, State of Nevada, and that on this 30th day of November, 2021, I caused to be served a copy of the foregoing, **STIPULATION FOR EXTENSION OF TIME TO FILE DISPOSITIVE MOTIONS (Second Request)**, by U.S. District Court CM/ECF Electronic Filing to:

Lisa A. Rasmussen, Esq.  
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/s/ Roberta W. Bibee  
An employee of the Office of the  
Nevada Attorney General